

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

**NRP HOLDINGS LLC, and
NRP PROPERTIES LLC,**

Plaintiffs,

v.

**CITY OF BUFFALO, BYRON W. BROWN, STEVEN
M. CASEY, DEMONE A. SMITH, RICHARD A.
STENHOUSE, BUFFALO JEREMIAH PARTNERSHIP
FOR COMMUNITY DEVELOPMENT, INC., CITY OF
BUFFALO URBAN RENEWAL AGENCY, JOHN DOES 1-
10, and JOHN DOE COMPANIES 1-5,**

Civ. No 11-CV-472(WMS)

Defendants.

NOTICE OF MOTION

NATURE OF ACTION: Breach of contract, RICO, tortious interference, et al.

MOVING PARTY: Plaintiffs.

DIRECTED TO: Defendants.

DATE AND TIME: To be scheduled by the Court if necessary.

PLACE: Hon. William M. Skretny, United States District Court,
Western District of New York, 2 Niagara Square,
Buffalo, New York.

SUPPORTING PAPERS: Declaration of Thomas S. Lane, dated January 23,
2017 and Exhibits thereto.

RELIEF REQUESTED: An Order granting Plaintiffs leave to file a Sur-Reply
Memorandum of Law and further relief as this Court
deems proper.

**GROUND FOR RELIEF
REQUESTED:** Local Rule 7(a)(6).

ANSWERING PAPERS: If any, are due at least 14 days after service pursuant
to local Rule 7(b)(2)(B) unless the Court issues an
Order setting deadlines pursuant to Local Rule
7(b)(1).

REPLY PAPERS: The moving party requests the opportunity to submit reply papers pursuant to Local Rule 7(b).

ORAL ARGUMENT: Requested.

Dated: January 23, 2016

WEBSTER SZANYI LLP
Attorneys for Plaintiffs

By: s/Thomas S. Lane

Thomas S. Lane
Nelson Perel
1400 Liberty Building
Buffalo, New York 14202
(716) 842-2800
tlane@websterszanyi.com
nperel@websterszanyi.com

TO: Daniel J. Brady, Esq.
Michael A. Brady, Esq.
Hagerty & Brady
Attorneys for Defendants
Byron Brown, City of Buffalo and Demone Smith
69 Delaware Avenue, Suite 1010
Buffalo, New York 14202

Michael A. Battle, Esq.
Devin J. Stone, Esq.
Barnes & Thornburg LLP
1717 Pennsylvania Avenue, N.W.
Suite 500
Washington, DC 20006-4623

Rodney O. Personius, Esq.
Personius Melber LLP
Attorneys for Defendant Steve Casey
2100 Main Place Tower
Buffalo, NY 14202

CC: Richard T. Sullivan, Esq.
Harris Beach PLLC
Attorneys for Defendant Buffalo Urban Renewal Agency (BURA)
726 Exchange Street, Suite 1000
Buffalo, New York 14210